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7 *Attorney(s) for Rothschild Broadcast Distribution Systems, LLC*

8 **IN THE UNITED STATES DISTRICT COURT**  
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

10 **ROTHSCHILD BROADCAST**  
11 **DISTRIBUTION SYSTEMS, LLC,**

12 *Plaintiff,*

13 v.

14 **YANKA INDUSTRIES, INC. d/b/a**  
15 **MASTERCLASS,**

16 *Defendant.*

**CASE NO.: 3:21-cv-04553-WHO**

**PLAINTIFF'S ANSWERS AND  
DEFENSES TO  
DEFENDANT'S  
COUNTERCLAIMS**

17  
18  
19 Now comes Plaintiff, Rothschild Broadcast Distribution Systems, LLC  
20 ("Plaintiff," "Counterclaim Defendant," or "RBDS"), by and through undersigned  
21 counsel, pursuant to Federal Rules of Civil Procedure 12, without admission of the legal  
22 sufficiency thereof and responding only to the factual allegations therein, and states as  
23 follows for its Answer and Defenses to Defendant and Counter Plaintiff Yanka  
24 Industries, Inc d/b/a MasterClass' ("Defendant," "Counterclaim Plaintiff," or  
25 "MasterClass") Counterclaims [Doc. 14] (hereafter the "Counterclaims") as follows:  
26  
27  
28

**PARTIES**

1  
2 1. RBDS has insufficient knowledge of the allegations contained in  
3 paragraph 1 and therefore denies same.

4 2. Admitted.

**JURISDICTION**

5  
6 3. RBDS incorporates by reference each of its answers in paragraphs 1-2  
7 above.

8 4. RBDS admits that jurisdiction is proper.

9 5. Admitted.

10 6. RBDS admits that venue is proper. RBDS denies any remaining  
11 allegations in paragraph 6.

**COUNT I**

12  
13 7. RBDS incorporates by reference each of its answers in paragraphs 1-6  
14 above.

15 8. RBDS admits that an actual controversy exists concerning infringement of  
16 the '221 Patent. RBDS denies any remaining allegations contained in paragraph 8.

17 9. Denied.

18 10. RBDS admits that MasterClass seeks a declaratory judgment. RBDS  
19 denies any remaining allegations contained in paragraph 10.

**COUNT II**

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21 11. RBDS incorporates by reference each of its answers in paragraphs 1-10  
22 above.

23 12. RBDS admits that an actual controversy exists regarding validity of the  
24 '221 Patent. RBDS denies any remaining allegations contained in paragraph 12.

25 13. Denied.

26 14. RBDS responds that the referenced document speaks for itself.

27 15. RBDS responds that the referenced document speaks for itself.  
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